Conduits

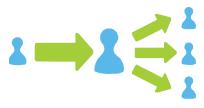
Government Accountability Board Thursday, August 28, 2014

Introduction

- GAB General Contact Information
 - 608.261.2028
 - gabcfis@wi.gov
- Topics
 - Definition of a conduit
 - What does a conduit report
 - When does a conduit report
 - CFIS Demonstration
 - Questions

What is a conduit?

- An individual or organization transfers the contribution to another individual or organization without exercising discretion as to the amount which is transferred and the individual to whom or organization to which the transfer is made [Wis Stat. § 11.01(5m)]
- Conduits can be sponsored by corporations or other associations.



Registering and reporting

- Use the GAB-9
 Registration Form, or the Register a
 Conduit option in CFIS
- Conduits report two things:
 - Contributions going out
 - Redirected Contributions



Redirected Contributions

- New as of 2013 Wisconsin Act 153
- Contributions from individuals who are deceased or who are no longer in contact with the conduit may be redirected to a conduit's sponsoring organization or administrative fund, <u>but</u> <u>cannot be redirected to candidate or non-affiliated</u> <u>committees</u>.
- Before a conduit may redirect contributions, the sponsor or administrative fund must be listed on their GAB-9 Conduit Registration Statement.

When can contributions be redirected?

- Contributions can only be redirected if the conduit has held the contribution for at least 24 consecutive months during which the individual that made the contribution has made no contact with the conduit, and one of the two scenarios applies:
 - Scenario 1: The conduit has, over the 24-month period, attempted in good faith to contact the individual or organization that contributed at least 10 times and has documented each attempt but has been unable to make contact. A conduit may not satisfy this requirement if all 10 attempted contacts occur within a period of 30 consecutive days. A conduit may satisfy this requirement by:
 - telephoning at the last-known number
 - sending a letter or postcard by U.S. mail
 - sending an email message
 - sending a text message
 - · sending a fax
 - or any combination of the above
 - Scenario 2: The 24-month period has passed, and the surviving spouse or executor of the estate of a deceased contributor authorizes the redirection of the contribution to the sponsor or administrative fund

Transmittal Letters

- Required for contributions to committees and those being redirected
- Can generate letters out of CFIS. Passcodes on CFIS Letters can help committees enter information
- Required Information:
 - A statement clearly identifying the conduit with the conduit's GAB ID#.
 - The name and address of the recipient with the recipient's GAB ID#, the date the transfer was made, and the total amount transferred.
 - The name and address of contributor and the amount of his or her contributions.
 - The contributor's occupation and employer, when an individual's total contributions to the same recipient exceed \$100 cumulatively in the calendar year.

When do conduits report?

- · At least twice a year: January and July Continuing
- Pre-Primary and Pre-Election reports if giving to candidate on ballot
- Late (48 Hour) Reports
 - Filed in last 15 days before an election, within 48 hours of disbursement being made
 - Only file if giving \$500 or more to an individual committee
- Filing a transmittal letter is not the same as filing a report!
- Must file electronically when over \$20,000 in a year
- Filing fee of \$100 if over \$2500 disbursements in a year

		STATE	OF WIS	CONSI	<u> </u>		
CONDUIT II	DENTIFIC	CATION					
Name of Conduit Fund			Telephon	e No.	GABI	D Number	
Street Address					1	Is This Report An A	No
City, State, and Zip Cod					Is Addre	ss Different Than Pre Yes	Viously Reported?
NAME OF REP	ORT						
January 0	continuing	Pre-Primary	_ 🗆	spring	Fal	Special	Election Office
July Cont	rung	Pre-Election	_ 🗆	Spring	Fall	Special	Election Office

Upcoming Report Deadlines

- Fall Pre-Election 2014: Due Monday, Oct. 27, 2014
 - Covers activity from end of July Continuing 2014 or Fall Pre-Primary 2014 through 10/20/14
- Fall Pre-Election Late Reporting Period
 - 10/21/14 through 11/4/14
- January Continuing 2015: Due Monday, February 2, 2015
 - Covers from end of last report (July Continuing 2014 or Fall Pre-Election 2014) through 12/31/14
- Filing officers required to send notices via 1st class mail
- Not receiving the notice does not mean you do not have to file a report!



Best Practices

- Watch reporting periods!
 - Once the transmittal letter is generated, you cannot switch the reporting period, you must delete and reenter or re-upload your transactions.
- Use uploads!
- Use transmittal letters from CFIS
 - Receiving committee can enter a code from that letter and the data entry is done for them.

Trans	smittal Lette	r for Frie	nds of Aaron R	odgers GAB ID:	: 010 XXXX	
Addr	ess Line1	312	E Washington	Ave		
Addr	ess Line2					
City,	State and Z	ip Ma	dison WI 53703			
listed If you	below.	ort the follow	wing records autor	\$200.00 matically into your Wisco he "Upload Conduit Conf	onsin Campaio	on Finance
login.		_b0ce5807_	9999 Tr	ansmittal letter Generate	ed: 04/30/201	14
login.		b0ce5807_		ansmittal letter Generate	ed: 04/30/201	AMOUNT
login. Passo	code: 9999		OR NAME			
Passi S.NO	code: 9999	CONTRIBUT	OR NAME	ADDRESS 123 Main Street, Green		AMOUNT
Passi S.NO	DATE 04/30/2014	Favre, Br	OR NAME	ADDRESS 123 Main Street, Green		AMOUNT
Passi S.NO	DATE 04/30/2014 Occupation:	Favre, Br	OR NAME	ADDRESS 123 Main Street, Green		AMOUNT
Passo S.NO 1 Conta	DATE 04/30/2014 Occupation: Employer De	Favre, Br Retired	or name ett	ADDRESS 123 Main Street, Green	BayWI	AMOUNT \$200.00
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Questions

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